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April 3, 2023

Via ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York N.Y. 10007

MEMO ENDORSED

4/19/23

OK

Re: *U.S.A. v. Zvi Zigelman*, 23-cr-65-CM

Colleen McMahon

Dear Judge McMahon:

We respectfully write to request an extension of time to object to Mr. Zigelman's draft PSR, from April 14 to April 28.

As Your Honor is aware, Mr. Zigelman recently pleaded guilty to a single-count Information charging him with PPP and EIDL fraud. Mr. Zigelman's draft PSR was filed on March 31 and thus, under Fed. R. Crim. P. 32(f), any objections are due on April 14. Much of the time between March 31 and April 14, however, is during the holiday of Passover (which this year runs from April 5–13), which both Mr. Zigelman and undersigned counsel observe and thus cannot meet to discuss his draft PSR. Moreover, the necessary preparations for Passover have made it difficult to arrange a time to review the PSR with Mr. Zigelman before the onset of Passover.

We therefore respectfully request a two-week extension, until April 28, to submit any objections to Mr. Zigelman's PSR. 

I have spoken to the assigned AUSA and she informs me she has no objection to this request.

Respectfully submitted,

/s/

Gedalia M. Stern 

Cc: AUSA Emily Deininger (via ECF)

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